1	T/M Tape K	2. The Wicked Voyeur
2	2/2/2 Tupe 11	Things Change #4 3. Where the Boys Aren't #10
3		Perfect Pink 5. Shadow Dancing, Vol. 2
4		6. The Madam's New Maid
5	TIM Tape L	 Amanda's Diary Gettin Lucky
6		3. Eternal Desire 4. Babearella
7		6. Sorority Sex Kitten #4 How to Marry a Doctor
8	T/M Tape M	2. Sex Across America #3, S. F.
9	1/1/1 Tape 1/1	In the Mind
10		5. Playthings A Day at the Spa
11		6. Fetish Island
12	TIM Tape N	1. More than a Handful #8 2. Private Fantasies #3
13		Dirty Deals
14		 Lacy Is Di New Brat Never Quite Enough
15	TO A CO	6. Fantasies in Black Leather
16	T/M Tape O	 Women in Control The Quick and the Hard
17		 Club Sin Devil or Angel
18		6. Nicci's Naked Hookers Shrink Wrapped
19	TIM Tape P	1. Pushover
20		 No Man's Land: Interracial Edition #4 Jiggly Queens 4
21		4. Ego 5. American Booty
22		6. Tuxi Dancer 2. Porn Star Comedian: Censor This
23	TIM Tape Q	A Virgin Tale
24		 For the Right Price Topless Room Service
25		5. My Invisible Friend6. Becoming Wet
26		
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1	TIM Tape R	1. 2.	Sex Across America #4, N. Y. Devil in Disguise
2		3. 4.	Pinups She's Got Cold Feet
3		5. 6.	Nobody But You The X Girls
4			
5	TIM Tape S	1. 3.	Lethal Information Sorority Shower Cam
6		4.	Natural Instincts Ego
7		5. 6.	Love 'Emor Leave 'Em Topless Marathon Runners
8	T/M Tape T	1.	The Secretary
9		3.	Amanda's Diary #3 Talk Dirty ToMe #12
10		4. 5.	The Pink Package House Party 4, "Office Party"
11			Eating Alone
12	END (<u>OF AN</u>	ALOGUE CABLE CHANNEL TAPES
13		DIG	HTAL CABLE CHANNEL 457
14	T/M Tape U	1.	Artemesia, Part I
15		2. 3.	Artemesia, Part II Shayla's Web
16		4. 5.	My Place Afro Centric 2
17		6.	L'ayla's Affairs
18	TIM Tape V	1. 3.	Fluff Amanda's Diary #4
19		4.	Caribbean Undercover Andrew's Aroused
20		5. 6.	The Boss's Wife Blue Monday
21	T/M Tape W	1.	Dark Angels
22	-	2. 3.	Les Vampires Designing Host
23		4. 5.	The Barflies Raw: Rise/Fall
24		6.	Love 'EmorLeave 'Em
25 25	T/M Tape X	1. 2.	Captain Mongo's Playhouse Bordello Blues
26		3. 5.	Bow Down Backstreet 3 Sex Across America #12
		6.	Objects of Desire 4 Fixed Upfor Love
25		υ.	i men opjoi Love
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COMPLAINT IN EQUITY FOR A DECLARATORY JUDGMENT, etc.

1	Т/М Таре Ү	1. 3.	Club Godiva Dirty Work
2			CorporateAffairs
3		4. 5 .	Westside Pt, 1 Westside Pt, 2
4			In Style
	T/M Tape Z	1.	Mystery Sex Theater 8: Once A Year Make-up
5		3.	The Academy
6		4. 6 .	Paradise Hole Dark Angels
7			Mystery Sex Theater
8	TIM TapeAA	1. 3.	Black Room No Man's Land # 32
а		2.	10 Little Angels
10		5 .	Visions of X 2 Adam and Eve
		6.	Eighteen Holes
11	T N Tape BB	Z.	Katja Kean's Sport Spectacular
12		3.	The Morgan Sex Project #3 Wicked Wishes
13		5 .	Heat Rises
14		6.	My Sexy Summer Job Chic Boxing
15	TIM Tape CC	1.	Nymph Fever 3
16	•	2. 3.	Babes Illustrated 10 Jumping Track
			Black Velvet 5
17		б.	Guys vs. Gals The Boxer and the Stripper
18	T/M Tape DD	1.	My Baby Got Back #22
1s	1711X Tape DD	3.	Cheerleader Orgy
20		4.	Strip Club Tails Strippers, Inc. 5
		5. 6.	Cheerleader Strippers Strip Search
2.1			•
22	TIM Tape EE	3.	Hot Couture Sexual Misbehavior
23		3. 4.	The Amateurs, Pt. 1 (Unknown Title)
24		5.	Love Hurts
25		6.	The Amateurs, Pt. 2
26	T/M Tape FF	2.	No Man's Land: Interracial Edition #5 No Man's Land #3
2		3. 4.	Made at the North Pole #4 Farmer's Daughters Do The Web
		5. 6.	On the Paths ∉ Time Making Changes
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1	T/M Tape GG	1.	East Meets West 3
2	-	2. 3.	Pleasureville Looks Like an Angel
		4. 5.	Talk Dirty to Me # 11 Palace d Sin
3		<i>6</i> .	Eve's Gift
4	T/M Tape HH	1.	Ethnicity 7
5		2 3.	Mystery Sex Theater Fact or Fiction
6		4. 5.	Sin Town Chloe's Acting Up
7		6.	Flash
8	TIM Tape II	1.	The Blue Room
9		2. 3.	Pure Sin Snow Bunnies
		4.	Liquid Sex
10		5. 6.	Casting Couch Cuties #2 Hungry
11	T/M Tape JJ	1.	In Your Face
12	Ziviz zupe oo	2.	Pleasure and Sin
13		3. 4.	Corporate Girl Trial By Sex
		5.	She's Got Cold Feet
14	T/M Tape KK	1.	Black Velvet 7
15		2. 3.	Party Trash Young Pretty Thing 3
16		4.	Sex Slider
17		5. 6.	Mystery Sex Theater 8: Once A Year Sorority K's 5
18	TIM Tape LL	1.	Identity Crisis
		2	Snow Bound
15		3. 4.	Lust, Lies, and Lingerie Computer Sex
2c		5. 6.	Hot Bods 11
21			Working It
22	T/M Tape MM	1. 2 3.	Sins QE A Woman Angel's Delights
		3.	A Winter's Passion Babe Watch 4
23		4. 5.	Sweet Desires
2∠		6.	The Bar
25	TIM Tape NN	1. 2.	Wages G Sin Almost Innocent
2€		3.	Fetish Dreams
2:		4.	Nymph Fever 4
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RE DECLARATORY JUDGMENT RELIEF AND STANDING TO FILE A PLEADING FOR CIVIL RELIEF.

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76. The fundamental issue which is before the Trial Court on Plaintiff's Complaint for Declaratory Judgment relief is whether A. T. & T. 's video tape broadcasts for a fee of \$11.95 to the 'laintiff in the La Tuna Canyon community in the City of Los Angeles (Sun Valley), County of Los Angeles, California, of the **malum** in se "hard-core pornographic" subject matter (6 hard-core films and five 15 minute "pandering" advertisements) contained in V.H.S. videotapes Tape A A-1 through A-6), Tape B (B-1 through B-6) and Tape C (C-1 through C-6), etc., through rape T-1 (T-1 through T-6), containing 121 malum in se "hard-core pornographic" films of tpproximately 75 minutes duration each, over Cable Channel 96 of A.T.&T's "Adults Only" "In Demand" pay television service, during the period from January 27,2001 through May 1,2001, are protected by the personal defense of "consenting adults" or are subject to a "Common Law" and statutory forfeiture of all of the fees under the civil and criminal provisions and the public nuisance tbatement sections of the California civil and criminal and other state codes of these United States, and to the injunction, abatement and forfeiture powers of the California and other state judicial systems, where A, T, & T, pursuant to its franchise, uses transmissions by satellite, public rights of way for cable, pays a franchise fee directly to the cities of Los Angeles County and other counties n the United States of America, for use of the rights-of-way and right to operate a cable television system and pays a county property tax for the use of public streets and a F.C.C. regulatory fee, and **4.** T. & T. is subject to the following conditions and limitations on the Franchise. pursuant to the City

of Los Angeles Cable Franchise Agreement. 62.4.05 and 62.4.06. which read as follows:

(AREA D)

The Company shall comply with: (i) all applicable laws and all requirements of the State of California, the FCC, and any other federal or State agency or authority of competent jurisdiction; (ii) all local laws, rules, regulations, and all orders or other directives of the City issued pursuant to the police powers of the City; and (iii) all rules, regulations, and all other directives of the City issued pursuant to this Agreement, provided that any such rules, regulations, orders or directives issued pursuant to this Agreement shall be consistent with provisions hereof

The franchise shall be revoked automatically upon any termination of this Agreement by the Council in accordance with the provisions hereof" (Our

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ramed. Plaintiff contends he has a statutory right and "standing", as a Private Attorney General, esident and owner of real estate in the La Tuna Canyon Community, to file a civil lawsuit in the Los Angeles County Superior Court and in the U.S. District Court as a private citizen under the California Business and Professions Code, to terminate the unlawful business activity of A.T.&T. and to request that, pursuant to the Common Law, their Franchise be automatically revoked pursuant to §2.4.06 and that all of the unlawful receipts derived by A.T.&T. from such illegal pusiness be forfeited in Equity, see Astol Calero-Toledo v. Pearson Yacht Leasing Co., 416 U.S. 533, 40 L.Ed.2d 452, 94 S.Ct. 2080 (1974), without deducting any of the cost of doing business, for hebenefit of the San Fernando Valley Community, State of California, County of Los Angeles, and other communities, which have suffered like per se injury by virtue of the unlawful grant of a governmental franchise and A.T.&T.'s response and intentional broadcast of unlawful "hard-core cornography" to the City of Los Angeles; and others in Los Angeles County, pursuant to their governmental franchise (which must be revoked pursuant to §2.4.06), and unlawful claim of a right to do so on the grounds of a "consenting adults" right to such services.

In Plaintiffs judgment, there can be only one answer to the above "legal" issue as

- **78.** Plaintiff contends that he has a statutory right and "standing" under the **California Business and Professions Code** and **California R.I.C.O. Statute** to file a civil lawsuit in the Los Angeles Superior Court to terminate the <u>unlawful business practice</u> of **A.T.&T**. "In Demand" Pay T.V. to charge a fee of \$1 1.95 for the "Adults Only" Program, i.e., the exhibition of hard-core pornographic films (a California misdemeanor) and the federal felonious "pandering" of "hard-core pornography" (a la "Ralph Ginzburg") of five (5) **15** minute preview segments. It is unlawful (fraudulent) to hold one's self out as having the right to transmit any "hard-core pornography" to "consenting adults" for a fee and to "pander" to indecency any preview segments for a fee.
- 79. Plaintiff, as one of the subscribers who has paid the <u>unlawful</u> subscription price incident to his daily surveillances, is entitled to a restitution of \$ 1,111.35(93x\$11.95) and punitive damages for *A.T.&T.* 's willful disregard of the above legal precedent and attorney's fees.
 - 80. Plaintiff has a right to file a "class action" on behalf of other paying subscribers and

ion-subscribers, pursuant to **C.C.P.** §382 on the ground that: **(1)** there is an ascertainable class in existence, and **(2)** there is a well-defined community of interest. Pursuant to that right, Plaintiff has the right to ascertain the class members from the **A. T.** & **T.** books and records re the above described 121 films. See **Vasquez v. Superior Court of San Joaquin Cty.**, 4 C.3d 80, 94 Cal.Rptr 796, 53 A.L.R.3d 513 so that the appropriate "refunds" can be prepared and payments mandated.

- As allegations in support of this Complaint, Plaintiff incorporates by reference in this Complaint the indecent photographic depictions of sexual conduct set forth in the "Time and Motion Studies" (which are attached hereto and identified at "Appendix E-1" through "Appendix E-7" to the January 4, 2002 pleading in the U.S. Supreme Court [6 1/8 in. x 9 1/4 in. format], a copy of which also appears as **Appendix A-1** through **A-7** to this Complaint [8.5 in. x 11 in. format) which are constructed from the surveillances hereinbefore made of the broadcasts of *A.T.&T*. during the period January 28, 2001 through May 1, 2001, and from May 1, 2001 through and including October 2, 2002.
- Plaintiff contends he has a statutory right and "standing" to file a civil action as a private citizen to abate an unlawful business practice and a public nuisance which is also a private nuisance to Plaintiffs real property interests as the owner of the real estate at 9055 La Tuna Canyon Road, Sun Valley, California, where the Los Angeles County Sheriff and District Attorney and Board of Supervisors and all other Local, State and Federal Law Enforcement Officials have refused to file a civil action to abate said moral oublic nuisances and unlawful business practice and where the City of Los Angeles Sunland/ Tujunga Cable District "D" of Los Angeles which services 9055 La Tuna Canyon Road, Sun Valley, California, is one of six A. T. & T. Corp. Cable Franchise Districts in Los Angeles, California, which offer this same "adults only" "In Demand Pay T.V. offering of malum in se "hard-core pornographic" motion picture films of indecent sexual conduct to other parts of Los Angeles, see Exhibit 1 to this Complaint (5 Pleadings in the U.S. Supreme Court) at Appendix F-10, which are served by A. T. & T. and its "Adults Only" program (as the franchise nolder of six Franchise Areas ("B", "D", "T", "F", "K", and "M") of the 14 Cable-casting Districts

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83. Plaintiff contends that he has "standing" as a plaintiff in a civil declaratory judgment ause of action to seek a declaratory judgment that upon these trial facts, the defense of "consenting idults" is not available in California or the United States. Plaintiff has devoted over 50 years of his practice of law specifically to litigations involving obscene matter and personally drafted the pleadings in the Public Nuisance Abatement lawsuit known as *People ex rel. Busch v. Projection Room Theater*, infra, and prepared the "Time and Motion Studies" which were pleaded by ncorporation in that landmark Public Nuisance Abatement Decision, in which the Court of Appeal in 118 Cal. App. 428 at 429 (fn.3) specifically focused upon the pleading practice and use of the "Time and Motion Study" as a "legal" issue and approved both; which "legal" issue in turn, was approved by the California Supreme Court, in its landmark decision *People ex rel. Busch v. Projection Room Theater*, 130 Cal. Rptr. 328 (1976), which held that as a pure legal issue 'consenting adults' is not a viable defense to any *malum in se* criminal conduct. Plaintiff contends that the *Projection Room Theater* decision is the lawtoday, controls the disposition of this case, and will continue to be the law until overruled.

- **84.** Plaintiff contends he has a right under both the **Common Law** and the **California R.I.C.O. Statute**, and "standing" to file a **Common Law** "forfeiture action" in **Equity**, see **Astol Calero-Toledo v. Pearson Yacht Leasing Co.**, supra, in the State and Federal Courts to require **4***T.&T.* and all other Defendants to cease and desist such unlawful Cable business in the State of California, and to disgorge its <u>unlawful profits</u> fraudulently derived from the (unlawful) exhibition of hard-core pornographic films on its "Adults Only" T.V. Cable programs (Analogue Channel 96, and Digital Channels 457 and 459), as an <u>unlawful business practice</u> under their franchise and the Los Angeles City Ordinances, State Statutes, and <u>Federal Statutes and the Federal Treaties reobscenity</u>, and the **U.S. Constitution**, and the **California Corporation Code**, the **Business and Professions Code**, the **Civil Code** and the **Penal Code** and other Codes of the State of California.
 - **85.** Plaintiff contends he has "standing" as a "Private Attorney General" in a civillawsuit

See *Information Technology Agency* of the City of Los Angeles, 122 **South** San Pedro Street, Room 600, Los Angeles, California 90012

to act as set forth herein above and to abate an unlawful business activity by a prerogative writ of mandamus, where the U.S. and California Attorney Generals, and the City and County of Los Angeles Law Enforcement Officials have ignored past complaints of Plaintiff and have refused to act in the year 2002, et seq., when confronted with a complaint supported by Tapes A, 1-6; B, 1-6; and C, 1-6, containing 18 hard-core films with different titles, which have been exhibited by 4.T.&T. during the period from January 27 through February 20,2001 (exhibition of five films per night), in violation of the State and Federal Obscenity Statutes. See in this regard, page 26, supra, 'AppendixF-7" to the January 4,2002 pleading in the U.S. Supreme Court, a copy of which appears as Exhibit 1 to this Complaint (5 Pleadings in the U.S. Supreme Court), the letter of L.A. Sheriff Lee Baca, dated March 28, 2001, to the Mayor of the L.A. Board of Supervisors, Michael D. Antonovich, which reads in part as follows:

- "On March 9, 2001, I directed my staff at the Major Crimes Bureau, Vice Unit, to review the three VHS videotapes provided by Mr. Jim Clancy and forwarded to me by your office. The investigators were instructed to make a determination as to whether or not these tapes violated California laws.
- "Although I acknowledge Mr. Clancy's objection to the disbandment of the Obscenity and Pornography Commission, and appreciate his attempt to bring forward possible illegal material, our review of these videos found them to be of a very generic nature in their depiction of sexually explicit material. The activities shown were between male and female participants, lacked violence or clearly-defined deviant sexual groups, and did not involve underage participants. What we found did not constitute a basis for prosecution."

"Hell On Heels" was one of the V.H.S. videotapes which was reviewed by Sheriff Baca. The transmittal letter of the Mayor of the L.A. Board of Supervisors, Michael D. Antonovich, to the Plaintiff, dated April 23, 2001, reads in part as follows:

- " Enclosed is a letter from the Sheriff regarding the videotapes provided by you.
- " If you have any questions regarding this matter, please contact Captain Robert Malone of the Major Crimes Bureau
- "Thank you for the opportunity to be of assistance in this regard."
- **86.** A total of 121 different titles of hard-core films were exhibited during the period from January 27 to May 1, 2001 (five hard-core films each night for 93 days with 121 different titles and the remainder as "repeats"). See Appendix **G1** and **G2** to Exhibit **1** to this Complaint (5 Pleadings in the U.S. Supreme Court). Computerized Time and Motion Studies will establish beyond any

loubt that <u>each</u> of the 121 Titles is a <u>patent violation of California and Federal law</u>. Compare, nowever, the above statement of Sheriff Lee Baca and Supervisor Antonovich, which presents a contrary view that can only be described as "shocking"! Plaintiff is satisfied that the four "time and notion studies" which are pleaded by incorporation in this Complaint at **Appendix A-1** through **A-7** "'HellOn Heels", "101 Cheerleaders & 1 Jock", and "More Than A Handful 9" [two versions]) will provide the necessary "shock" to this Court, sitting in Equity to grant the relief prayed for nerein.

RE: THE TRIAL EXHIBITS

- 87. Plaintiff is prepared to make exact V.H.S. videotape copies of the 121 different titles which were surveilled to May 1, 2001 on analogue Channel 96. Each copy will have a "military" time-stamp on each film on each frame of the copy, generated from a time/ date generator, so that a particular frame can be identified by its "time-stamp" on the original copy. Six of the films will appear on one 8 hour V.H.S. videotape "timed copy", which will be designated sequentially as rape A (A-1 thru A-6) through Tape T (T-1 thru T-6). The timed videotape copies of the 121 different titles will appear in evidence with the below exhibit designations: as "TIM Tape A, 1-6" through "T/M Tape T, 1-6, as set forth at paragraph 16, supra.
- **88.** Plaintiff is prepared to construct "computerized" **Time and Motion Studies** of each of such 121 films, and will "incorporate the same in this Complaint by amendment" and further reference, as "allegations" of the "unlawful nature of the indecency contained in each of the videotape itself', as was done in the *Projection Room Theatre*, supra, litigation.

DIGITAL CABLE TRANSMISSIONS ON CHANNEL 457 FROM MAY 2 THROUGH AUGUST 4,2001.

89. On May 1, 2001, *A.T.&T.*, at Plaintiffs request, installed its Digital service at 9055 La Tuna Canyon Road, Sun Valley, California 91352, and terminated its Analogue Channel 96 broadcast, for which *A.T.&T.* charged \$11.95 for broadcasting 8 hours (5–75 minute features) of *malum in se* hard-core pornography and "pandering" previews from 10:00 p.m. to 6:00 a.m. In its

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dace, *A.T.&T.* commenced operating the same "In Demand" Pay T.V. service, offering "Adults Only" programming on a continuous 24 hour schedule on Cable Digital Channel 457, under the title "The Hot Network", and on Digital Channel 459, under the title "The Hot Zone". During each calendar day (24 hours), eight different malum in se hard-core pornographic taoes. with different itles were cable-cast twice daily—once during the morning (12 hour) schedule (1:00 a.m.-1:00 p.m.), and repeated a second time during the afternoon (12 hour) schedule (1:00 p.m.-1:00 a.m.). for which t charged \$11.95 for each of eight (8) 3 hour "blocks", in which it cable-casted two malum in se lard-core pornographic tapes and two separate 15 minute "ads" of "pandering" previews of coming ittractions during each 3 hour segment. The daily schedule for Cable Digital Channel 457 (The Hot Vetwork) and Channel 459 (The Hot Zone) for April 15, 2002, is representative of the present service (see, in this regard, the U.S. Supreme Court Order, dated April 15, 2002, wherein the J.S. Supreme Court refused to exercise its Original Jurisdiction regarding "Hell On Heels". As the Court was delivering its April 15TH Order, A.T.&T. was replaying "Hell On Heels"):

3 Hr. Block: 1:00 a.m. - 2:30 a.m.: wildflower

2:30 a.m. - 4:00a.m.: *Trailer Trash Nurses:4*

3 Hr. Block: 4:00 a.m. - 5:30 a.m.: Lil' Shorty

5:30 a.m. - 7:00 a.m.: Tricked By An Angel 2

3 Hr. Block: 7:00 a.m. - 8:30 a.m.: Stiff Evidence 1

8:30 a.m. - 10:00 a.m.: Asia Is In Too Deep

3 Hr. Block 10:00 a.m. - 11:30 a.m.: Taken

11:30 a.m. - 1:00p.m.; *Hell On Heels**

3 Hr. Block: 1:00p.m. - 2:30 p.m.: In The Heat

2:30 p.m. -4:00 p.m.: *Blonde Brigade*

3 Hr. Block: 4:00 p.m. - 5:30 p.m.: Lil' Shorty

5:30 p.m. - 7:00 p.m.: *Tricked By An Angel*

3 Hr. Block: 7:00 p.m. - 8:30 p.m.: Stiff Evidence 1

8:30 p.m. - 10:00 p.m.: Asia Is In Too Deep

3 Hr. Block: 10:00 p.m. - 11:30 p.m.: Taken

11:30 p.m. - 1:00 a.m.: Hell On Heels*

90. Plaintiffs continuous surveillance of the A.T.&T. "In Demand" Pay T.V. "Adults Only" Cable Digital Channel 457 operation ("TheHot Network Channel) has established that the following additional malum in se hard-core pornographic tapes were cable-cast on "The Hot

1	<i>letwork</i> " (Digital Channel 457) during the three month period from May 2,2001 through August 5,				
2	001:				
3 4	Digital Feature 1 (5/3/01)	1. 2. 3. 4.	Hell, Hookers & Heels Eating Alone Artemesia, Part I Artemesia, Part II		
5		5.	Shayla's Web		
6	Digital Feature 2 (5/4/01)	1. 2.	More than a Handful #9 Sorority Shower Cam		
7	(/	3. 4.	Sex Across America #4, N. E: My Invisible Friend		
8		5. 6.	Nobody But You Afro Centric 2		
9		7. 8.	The Pink Package Porn Star Comedian: Censor This		
10		9. 10.	Amanda's Diary #3 TheX Girls		
11	Digital Facture 2		Porn Star Comedian: Censor This		
12	Digital Feature 3 (5/5/01)	1. 2. 3.	Amanda's Diary #3 Lethal Information		
13		4.	My Place		
14		5. 6.	Layla's Affairs Sex Across America #4, N. E:		
15	Digital Feature 4	1.	Sex Across America #4, N. E:		
16	(5/6/01)	2. 3.	Devil in Disguise Fluff		
17		4. 5.	Talk Dirty ToMe Amanda's Diary #4		
18		6. 7.	The Pink Package Afro Centric 2		
19		8. 9.	Nobody But You Layla's Affairs		
2(Digital Feature 5	1.	Talk Dirty To Me		
21	(5/7/01)	2. 3.	Amanda's Diary #3 The Pink Package		
2:		4. 5.	Layla's Affairs <u>More than a Handful #9</u> Caribbean Undercover		
2:		6. 7.	Caribbean Undercover Andrew's Aroused		
24		8.	Taxi Dancer		
2:	Digital Feature 6 (5/8/01)	1. 2.	Taxi Dancer Amanda's Diary #3		
2(, ,	3. 4.	Fluff Afro Centric 2		
2		5. 6.	<u>101 Cheerleaders & 1 Joc</u> The Boss's Wife		
21		7.	Blue Monday		
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1	Digital Feature 7 (5/9/01)	1. 3.	Natural Instincts Nobody But You
2	(3/7/01)		Eating Alone
3		5.	Dark Angel Shayla's Web
4		6. 7.	Les Vampires Designing Host
		8.	Hell, Hookers & Heels
5		9.	Raw: Rise/Fall
6	Digital Feature 8	1.	Hell, Hookers & Heels
7	(5/10/01)	2. 3.	Raw: Rise/Fall The Pink Package
8		4. 5.	Layla's Affairs Bar Flies
0		7 .	Eating Alone
9		8.	Afro Centric 2 Talk Dirty ToMe # 12
10		9.	A Virgin Tale
11	Digital Feature 9	1.	Talk Dirty To Me
	(5/11/01)	3.	A Virgin Tale
12		4.	Love 'Emor Leave 'Em Fluff
13		5. 6.	Bow Down Backstreet 3 Sex Across America #12
14		8.	Sorority Shower Cam
15			Natural Instincts
	Digital Feature 10	1.	Natural Instincts
16	(5/12/01)	3.	Talk Dirty ToMe <u>More than a Handful #9</u>
17		4 .	101 Cheerleaders & 1 Jock
18		5. 6.	Amanda's Diary #4 Afro Centric 2
19		8.	Amanda's Diary #4
		9.	Eating Alone The Pink Package
20	Digital Feature 1	1.	The Pink Package
21	(5/13/01)	3.	Amanda's Diary#4
22		5 .	Bow Down Backstreet 3 Lethal Information
			Objects of Desire 4
23		6. 8.	Devil in Disguise Porn Star Comedian: Censor This
24			Taxi Dancer
25			
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3	Digital Feature 12 (5/14/01)	1. 2. 3. 4. 5. 6. 1. 8. 9.	Porn Star Comedian: Censor This Tuxi Dancer Bar Flies Amanda's Diary #4 A Virgin Tale Fixed Upfor Love Club Godiva More than a Handful #9 Layla's Affairs (T/M U-6)
6 7 8 9 10	Digital Feature 13 (5/15/01)	1. 2. 3. 4. 5. 6. 7. 8. 9.	More than a Handful #9 Layla's Affairs Objects of Desire 4 Bow Down Backstreet 3 Tuxi Dancer Dirty Work Lethal Information CorporateAffairs Sex Across America #4, N. Y. My Place
12 13 14 15	Digital Feature 14 (5/16/01)	1. 2. 3. 4. 5. 6. 1. 8. 9.	Sex Across America #4, N.Y. My Place Westside Pt. 1 Westside Pt. 2 M: Caught In the Act Raw: Rise/Fall Les Vampires In Style Shayla's Web Eating Alone
17 18 19 20 21	Digital Feature 15 (5/17/01)	1. 2. 3. 4. 5. 6. 7. 8. 9.	Shayla's Web Eating Alone TheX Girls Sorority Shower Cam Mystery Sex Theater Natural Instincts Layla's Affairs Bow Down Backstreet 3 Objects of Desire 4
22 23 24 25 26 27 28	Digital Feature 16 (5/18/01)	1. 2. 3. 4. 5. 6. 7. 8.	Bow Down Backstreet 3 Objects of Desire 4 My Place Make-up A Virgin Tale Nobody But You Layla's Affairs Amanda's Diary #4

I	Digital Feature 17 (5/19/01)	1. 2.	Layla's Affairs Amanda's Diary #4
2	(======	3. 4.	Sorority Shower Cam Talk Dirty To Me #12
3		5. 6.	The Academy
4		7.	Fluff Bow Down Backstreet 3
5		8. 9.	Bar Flies TheX Girls
6	Digital Feature 18 (5/20/01)	1. 2.	Bar Flies TheX Girls
7	(3/20/01)	3. 4.	The Pink Package
8		5.	The Sopornos #2 Captain Mongo's Playhouse
9		6. 7.	The Academy Eating Alone
10		8. 9.	My Pľace Make-up
11	Digital Feature 19	1.	My Place
12	(5/21/01)	2. 3.	Make-up Talk Dirty ToMe #12
13		4. 5.	Paradise Hole Bow Down Backstreet 3
		6 .	Dark Angels
14		7. 8.	The Academy Mystery Sex Theater
15	Digital Feature 20	1.	TheAcademy
16	(5/22/01)	2.	Mystery SexTheater
17		3. 4.	Captain Mongo's Playhouse Bar Flies
18		5. 6.	Amanda's Diary #4 The Secretary
		7.	Love 'EmorLeave 'Em
19		8. 9.	Corporate Girl The Pink Package
20		10.	TheX Girls
21	Digital Feature 21 (5/23/01)	1. 2.	The Pink Package TheX Girls
22	(3/23/01)	3.	M: Caught In the Act
23		4. 5.	Eating Alone Les Vampires
24		6. 7.	Artemesia, Part I Artemesia, Part II
		8.	WestsidePt. 1
25		9. 10.	WestsidePt. 2 Dark Angels
26		11.	Corporate Girl
27			
28			

1	Digital Feature 22 (5/24/01)	1. 2.	Westside Pt. 2 Dark Angels
2	(3/24/01)	3. 4.	Mystery Sex Theater Make-up
3		5. 6.	Black Room Amanda's Diary #4
4		7. 8.	Fluff My Invisible Friend
5		9.	Sex Across America #4, N. E:
6	Digital Feature 23 (5/25/01)	1. 2.	My Invisible Friend Sex Across America #4, N. E:
7	(3/23/01)	3. 4.	The Pink Package Mystery Sex Theater
8		5. 6.	No Man's Land #32 The Academy
9		7. 8.	No Man's Land #32 Captain Mongo's Playhouse
10		9. 10.	Fluff Love 'Emor Leave 'Em
11	Digital Feature 24		
12	(5/26/01)	1. 2. 3.	Fluff Love 'Emor Leave 'Em No Man's Land # 32
13		3. 4. 5.	Make-up 10 Little Angels
14		6. 7.	My Place Mystery Sex Theater
15		8.	Objects of Desire 4
16	Digital Feature 25 (5/27/01)	1. 2.	Objects of Desire 4
17	(3/2//01)	3. 4.	Fluff The Academy No Man's Land #32
18		5. 6.	Bordello Blues 10 Little Angels
19		7. 8.	Bordello Blues Captain Mongo's Playhouse
2c		9. 10.	More than a Handful #9 The Barflies (T/M W-4)
21	Digital Feature 26	1.	Captain Mongo's Playhouse
22	(5/28/01)	2. 3.	More than a Handful #9 Bow Down Backstreet 3
2:		3. 4. 5.	Wicked Wishes Andrew's Aroused
24		6. 7.	Visions of X 2 The Sopornos #2
24		8. 9.	Make-up Afro Centric 2
2€		7.	THE CEILIN 2
2'			
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			-67-

 ${\tt COMPLAINTINEQUITYFORADECLARATORYJUDGMENT, etc.}$

1	Digital Feature 27	1.	Make-up
2	(5/29/01)	2. 3.	Afro Centric 2 101 Cheerleaders & 1 Jock
		4.	<i>The Academy</i>
3		5. 6.	Bordello Blues Adam and Eve
4		7. 8.	No Man's Land #32
5		9.	The Boss's Wife Black Room
6		10.	10 Little Angels
	Digital Feature 28	1.	Black Room
7	(5/30/01)	2. 3.	10 Little Angels M: Caught In the Act
8		4. 5.	Raw: Rise/Fall
9		6.	Eating Alone Eating Alone
10		7. 8.	In Style Shayla's Web
	D. 1. 1. 7		·
11	Digital Feature 29 (5/31/01)	1. 2.	Designing Host Objects of Desire 4
12	,	3. 4.	The Barflies
13		5.	Nymph Fever 3 <u>More than a Handful #9</u>
14		6. 7.	Wicked Wishes Visions of X 2
		8.	Amanda's Diary #4
15	Digital Feature 30	1.	Visions of X 2
16	(6/1/01)	2. 3.	Amanda's Diary #4
17		4.	The Academy Captain Mongo's Playhouse
18		5. 6.	Sexual Misbehavior Eating Alone
		7.	Bordello Blues
19	Digital Feature 31	1.	Afro Centric In The Amazon Pt. 2
20	(6/2/01)	2. 3.	Black Room Bordello Blues
21		4.	Fluff
22		5. 6.	Eighteen Holes Layla's Affairs
		7.	Katja Kean's Sport Spectacular
23		8. 9.	Eating Alone Nymph Fever 3
24	Digital Faatura 27		v 1
25	Digital Feature 32 (6/3/01)	1. 2.	Eating Alone Nymph Fever 3
26		3. 4.	Wicked Wishes Visions of X 2
		5.	The Morgan Sex Project #3
21		6. 7.	L.A. Unforgiven Rainwoman #14
28		8.	The Barflies
			-68-

COMPLAINT IN EQUITY FOR A DECLARATORY JUDGMENT, etc.

1 2 3 4 5 6	Digital Feature 33 (6/4/01)	1. 2. 3. 4. 5. 6. 7. 8. 9. 10.	Nymph Fever 3 Rainwoman #14 The Morgan Sex Project #3 Babes Zllustrated #10 Bow Down Backstreet 3 Trial By Sex More than a Handful #9 Devil in Disguise 10Little Angels Indigo Nights Babes Zllustrated 10
7	Digital Feature 34	1.	10 Little Angels
8	(6/5/01)	2. 3.	Indigo Nights Fluff Make un
9		4. 5.	Make-up Guys vs. Gals Nymph Egyar 3
10		6. 7. 8.	Nymph Fever 3 The Boxer and the Stripper Wicked Wishes
11		8. 9.	Eighteen Holes
12	Digital Feature 35 (6/6/01)	1. 2.	Wicked Wishes Eighteen Holes
13	(0/0/01)	3. 4.	The Black Room Bordello Blues
14		5. 6.	Black Velvet 5 Weekend in Bologna
15		7. 8.	Fluff Knee Deep In It
16		9. 10.	Mystery Sex Theater Weekend in Bologna
17	Digital Feature 36	1.	Knee Deep In It
18	(6/7/01)	2. 3.	Mystery SexTheater No Man's Land #32
19		4. 5.	Nymph Fever 3 Jumping Track
20		6. 7.	The Morgan Sex Project #3 Jumping Track
21		8. 9.	Black Room Visions & X 2
22		10.	Les ObstaclesDe L'Amour
23	Digital Feature 37 (6/8/01)	1. 2.	Visions ₫ X 2 Les Obstacles De L 'Amour
24	(0/0/01)	3. 4.	Eating Alone Mystery Sex Theater
25		5. 6.	My Sexy Summer Job 10 Little Angels
26		0. 7. 8.	Make-up My Place
27		0.	my i une
28			
			-69-

1	Digital Feature 38	1.	Make-up
	(6/9/01)	2. 3.	My Place
2		3. 4.	Chic Boxing No Man's Land # 32
3		5.	The Barflies
4		6. 7.	Les Obstacles De L'Amour Wicked Wishes
_		8.	Nymph Fever 3
5		9.	The Black Room
6	Digital Feature 39	1.	Les Obstacles De L'Amour
7	(6/10/01)	2. 3.	Wicked Wishes Afro Centric In The Amazon Pt. 2
		4.	Layla's Affairs
8		5. 6.	Heat Rises <u>More than a Handful #9</u>
9		7.	WithoutShame
10		8. 9.	Ethnicity #6 No Man's Land # 32
10		9.	NO Wan's Lana #32
11	Digital Feature 40	1.	Ethnicity #6
12	(6/11/01)	2. 3.	No Man's Land # 32 Mystery Sex Theater
		4.	My Sexy Summer Job
13		5. 6.	Afro Centric In The Amazon Pt. 2 My Place
14		7.	Objects of Desire 4
1.5		8.	Heat Rises
15		9. 10.	Amanda's Diary #4 10 Little Angels
16	54.45		-
17	Digital Feature 41 (6/12/01)	1. 2	Amanda's Diary #4 10 Little Angels
	(0/12/01)	2. 3.	Objects & Desire 4
18		4.	Wicked Wishes
19		5. 6.	Mystery Sex Theater Topless Marathon Runners
		7.	The Black Room
20		8. 9.	Eighteen Holes Indigo Nights
21		10.	Weekend in Bologna
22	Digital Feature 42	1.	Indigo Nights
23	(6/13/01)	2. 3.	Weekend in Bologna Captain Mongo's Playhouse
		4.	Sexual Misbehavior
24		5. 6.	Make-up Chic Roying
25		0. 7.	Chic Boxing Wicked Wishes
		8.	Black Velvet5
26		9. 10.	No Man's Land #32 Visions of X 2
21			· · · · · · · · · · · · · · · · · · ·
28			

1 2	Digital Feature 43 (6/14/01)	1. 2. 3.	No Man's Land # 32 Visions of X 2 10 Little Angels
3		4. 5.	Black Velvet 5 The Amateurs, Pt. 1
4		6. 7.	Jumping Track The Amateurs, Pt. 1
5		8. 9.	CaptainMongo's Playhouse Trial By Sex
6	Digital Feature 44	1.	CaptainMongo's Playhouse
7	(6/15/01)	2. 3.	Trial By Sex Eighteen Holes
8		4. 5.	Eating Alone The Amateurs, Pt. 2
9		6. 7.	Nymph Fever 3 Objects d Desire 4
10		8. 9.	The Black Room Fluff
11	Digital Feature 45	1.	The Black Room
12	(6/16/01)	2. 3.	Fluff More than a Handful #9 The Bardine
13		4. 5.	The Barflies My Baby Got Back #22
14		6. 7. 8.	Wicked Wishes Devil in Disguise Nymph Fever 3
15	Digital Factors AC		Devil in Disguise
16	Digital Feature 46 (6/17/01)	1. 2. 3.	Nymph Fever 3 Cheerleader Orgy
17		4. 5.	The Boxer and the Stripper Strip Club Tails
18		6. 7.	<u>101 Cheerleaders & 1 Jock</u> Strippers, Inc. 5
19		8. 9.	Cheerleader Strippers Strip Search
20	Digital Feature 47	1.	CheerleaderStrippers
21	Digital Feature 47 (6/18/01)	2. 3.	Strip Search Bordello Blues
22		4. 5.	Eighteen Holes 10 Little Angels
23		6. 7.	Visions d X 2 Nymph Fever 3
24		8. 9.	Hot Couture Wicked Wishes
25		10.	Jumping Track
26			
, 2;			
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			-71-

COMPLAINT IN EQUITY FOR A DECLARATORY JUDGMENT, etc.

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1	Digital Feature 48	1.	Wicked wishes
2	(6/19/01)	2. 3.	Jumping Track Sexual Misbehavior
3		4. 5.	The Amateurs, Pt. 1 Amanda's Diary #4
4		6. 7.	Xtreme Skating Captain Mongo's Playhouse
5		8. 9.	Katja Kean's Sport Spectacular The Morgan Sex Project #3
6	D' '4.1E 40	10.	My Baby Got Back #22
7	Digital Feature 49 (6/20/01)	1. 2.	The Morgan Sex Project #3 My Baby Got Back #22
8		3. 4.	My Sexy Summer Job Without Shame
9		5. 6.	Love Hurts The Amateurs, Pt. 2
10		7 . 8.	Black Velvet 5 Chic Boxing
11	Digital Feature 50	1.	Black Velvet 5
12	(6/21/01)	2. 3.	Chic Boxing Visions of X 2
13		4. 5.	Xtreme Skating Mystery Sex Theater 8: Once A Year Sexual Michael and a s
14		6. 7.	Sexual Misbehavior Eighteen Holes
15		8. 9.	The Academy Strip Club Tails
16	Digital Feature 51 (6/22/01)	1. 2.	The Academy Strip Club Tails
17	(0/22/01)	2. 3. 4.	Jumping Track Knee Deep In It (T/M C-5)
18		5. 6.	No Man's Land: Interracial Edition #5 Bow Down Backstreet 3
19		7. 8.	Bow Down Backstreet 3 No Man's Land: Interracial Edition #5
20		9. 10.	The Morgan Sex Project #3 Bow Down Backsheet 3
21		11.	Heat Rises
22	Digital Feature 52 (6/23/01)	1. 2.	Bordello Blues The Morgan Sex Project #3
23	(0/20/01)	3. 4.	My Baby Got Back #22 L.A. Unforgiven
24		5. 6.	Made at the North Pole #4 Mystery Sex Theater 8: Once A Year
25		7. 8.	Nymph Fever 3 Strip Club Tails
26		9.	Sexual Misbehavior
27			
28			
			70

1 2 3 4 5	Digital Feature 53 (6/24/01)	1. 2. 3. 4. 5. 6. 7. 8. 9.	Strip Club Tails Sexual Misbehavior Chic Boxing No Man's Land: Interracial Edition #5 Farmer's Daughters Do The Web The Amateurs, Pt. 1 Jumping Track My Sexy Summer Job Bordello Blues
6	Digital Feature 54	1.	My Sexy Summer Job Bordello Blues
7	(6/25/01)	2. 3.	The Amateurs, Pt. 2
8		4. 5.	My Baby Got Back #22 Wicked Wishes
9		6. 7.	No Man's Land #32 Eating Alone)
10		8. 9. 10.	Farmer's Daughters Do The Web No Man's Land: Interracial Edition #5 Captain Mongo's Playhouse
11	Digital Feature 55	1.	No Man's Land: Interracial Edition #5
12	(6/26/01)	2. 3.	Captain Mongo's Playhouse Black Velvet 5
13		4.	Jumping Track
14		5. <u>6</u> .	The Academy Babes Illustrated 10
15		7, 8.	Bordello Blues Nymph Fever 3
16		9. 10.	Chic Boxing My Sexy Summer Job
17	Digital Feature 56	1.	Chic Boxing
18	(6/27/01)	2. 3.	My Sexy Summer Job Heat Rises
		4.	The Morgan Sex Project #3
19		5. 6.	Objects & Desire 4 Strip Club Tails
20		7. 8.	Visions & X 2 Love Hurts
21		9. 10.	ToplessMarathon Runners Made at the North Pole #4
22	D. 1		
23	Digital Feature 57 (6/28/01)	1. 2.	Topless Marathon Runners Made at the North Pole #4
24	, , ,	3. 4.	The Amateurs, Pt. I Made at the North Pole #4
25		5. 6.	On the Paths ₫ Time Visions ₫ X 2
		7.	On the Paths of Time Love Hurts
26		8. 9.	Farmer's Daughters Do The Web
27		10.	<u>101 Cheerleaders & 1 Jock</u>
28			

1	Digital Feature 58	1.	Farmer's Daughters Do The Web
2	(6/29/01)	2. 3.	<u>101 Cheerleaders & 1 Jock</u> Mystery Sex Theater 8: Once A Year
		4.	The Amateurs, Pt. 2
3		5. 6.	Making Changes Made at the North Pole #4
4		7.	Making Changes
_		8. 9.	Black Velvet 5 Sexual Misbehavior
5		10.	The Academy
6	Disidal Essay 50	1	Sexual Misbehavior
7	Digital Feature 59 (6/30/01)	1. 2.	The Academy
,	(3.	Love Hurts
8		4. 5.	My Sexy Summer Job East Meets West 3
9		5. 6.	No Man's Land: Interracial Edition #5
		7.	East Meets West 3
1C		8.	On the Paths of Time
11		9. 10.	Heat Rises Making Changes
''		10.	
12	Digital Feature 60	1.	Heat Rises
13	(7/1/01)	2. 3.	Making Changes Chic Boxing
13		4.	Pleasureville
14		5.	Looks Like an Angel
15		6. 7.	Sexual Misbehavior Looks Like an Angel
1-		8.	The Amateurs, Pt. 1
16		9.	Black Velvet 5
17		10.	No Man's Land: Interracial Edition #5
11	Digital Feature 61	1.	Black Velvet 5
18	(7/2/01)	2.	No Man's Land: Interracial Edition #5
19		3. 4.	My Sexy Summer Job Creating Nicole
13		5.	No Man's Land: Interracial Edition #5
2(6.	Talk Dirty to Me #1I
2		7. 8.	Pleasureville Palace & Sin
4		9.	Making Changes
2:		10.	Farmer's Daughters Do The Web
2:	Digital Feature 62	1.	Making Changes
4.	(7/3/01)	2.	Farmer's Daughters Do The Web
،2	, , ,	3.	My Baby Got Back #22
2		4. 5.	The Sopornos #2 IO Little Angels
<i>L</i>		6.	Made at the North Pole #4
21		7.	Groove with Me
2		8. 9.	Eve's Gift The Amateurs, Pt. 2
4		10.	Gen Sex
2			
			7.4

1	Digital Feature 63 (7/4/01)		The Amateurs, Pt. 2 Gen Sex
2	(// !! • 1)	3. <i>I</i>	East Meets West 3 Jumping Track
3		I	Ethnicity 7 Mystery Sex Theater 8: Once A Year
4		7 . <i>l</i>	Ethnicity 7 Made at the North Pole #4
5		9. <i>1</i>	East Meets West 2 Talk Dirty to Me #11
6	Disidal Fastana 64		Made at the North Pole #4
7	Digital Feature 64 (7/5/01)	2.	East Meets West 2 No Man's Land: Interracial Edition #5
e		4.	Fact or Fiction Making Changes
ç		6.	Strip Club Tails Sin-Town
10			Mystery Sex Theater 8: Once A Year
11	Digital Feature 65 (7/6/01)		Sin Town Mystery Sex Theater 8: OnceA Year
1:	(770701)	3.	On the Paths of Time My Sexy Summer Job
1:		5. 6.	Chloe's Acting Up The Amateurs, Pt. 1
14		7.	East Meets West 3 Love Hurts
1:		9.	The Third Kiss
16	Digital Feature 66	••	Love Hurts The Third Kiss
1'	(7/ 7/01)	2. 3.	Farmer's Daughters Do The Web
1		4. 5.	Making Changes Flash The Amateurs, Pt. 2
1		6. 7.	Chic Boxing
2		8. 9.	My Baby Got Back #22 Weekend in Deauville
2	Digital Feature 67 (7/8/01)	1.	My Baby Got Back #22
2	(7/8/01)	2. 3.	Weekend in Deauville Heat Rises
2		4. 5.	The Morgan Sex Project #3 The Blue Room
2		6. 7.	Love Hurts On the Paths of Time
2		8. 9.	Eighteen Holes Staff
2			
2			
2			
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1	Digital Feature 68	1.	Eighteen Holes
2	(7/9/01)	2. 3. 4.	Staff Making Changes Computarized Sax Cravinas
3		5.	Computerized Sex Cravings Fact or Fiction
4		6. 7.	Pure Sin The Amateurs, Pt. 2
4		8.	Pleasureville
5		9. 10.	Strip Club Tails Flash
6		10.	rusn
7	Digital Feature 69	1. 2.	Strip Club Tails Flash
7	(7/10/01)	2. 3.	Heat Rises
8		4.	Eighteen Holes
_		5.	Chloe's Acting Up
9		6. 7.	Snow Bunnies Making Changes
10		8.	Looks Like an Angel
10		9.	Sexual Misbehavior
11		10.	On the Paths & Time
12	Digital Feature 70	1.	Sexual Misbehavior
	(7/11/01)	2.	On the Paths & Time
13		3. 4.	Black Velvet5 Made at the North Pole #4
14		4. 5.	East Meets West 3
14		6.	No Man's Land: Interracial Edition #5
15		7.	The Amateurs, Pt. 2
		8.	Mystery Sex Theater 8: Once A Year
16		9.	Eve's Gift
47		10.	My Sexy Summer Job
17	Digital Feature 71	1.	Eve's Gift
18	(7/12/01)	2.	My Sexy Summer Job
10	(1,12,01)	3 .	Flash
19		4.	Love Hurts
		5.	Liquid Sex
2c		6.	Farmer's Daughters Do The Web
04		7. 8.	Making Changes The Third Kiss
21		o. 9.	On the Paths & Time
22	Digital Feature 72	1.	The Third Kiss
23	(7/13/01)	2.	On the Paths & Time
		3.	The Blue Room
24		4. 5	Ethnicity 7 Casting Couch Cuties #2
24		5. 6.	Casting Couch Cuties#2 Sexual Misbehavior
21		0. 7.	On the Paths & Time
2t		8.	Palace & Sin
		9.	Creating Nicole
27			
28			

1	Digital Feature 73	1.	Palace & Sin
2	(7/14/01)	2. 3.	Creating Nicole Mystery Sex Theater 8: Once A Year
3		4. 5.	Strip Club Tails Hungry
4		6. 7.	The Morgan Sex Project #3 Hungry
5		8. 9.	Made at the North Pole #4 On the Paths ← Time
6		10.	Looks Like an Angel
7	Digital Feature 74 (7/15/01)	1. 2.	On the Paths & Time Looks Like an Angel
8		3. 4.	Chloe's Acting Up The Blue Room
ç		5. 6.	In Your Face Eighteen Holes
10		7. 8.	Heat Rises No Man's Land: Interracial Edition #5
11		9.	East Meets West 3
12	Digital Feature 75 (7/16/01)	1. 2.	No Man's Land: Interracial Edition #5 East Meets West 3
1:		3. 4.	Sexual Misbehavior Casting Couch Cuties #2
1∠		5. 6.	My Baby Got Back #22 Pleasure and Sin)
1:		7. 8.	The Morgan Sex Project #3 Hungry
16		9.	On the Paths & Time
1:	Digital Feature 76 (7/17/01)	1. 2.	East Meets West 3 On the Paths & Time
1{		3. 4.	The Blue Room Strip Club Tails
19		5. 6.	Looks Like an Angel She's Got Cold Feet
2(7. 8.	Mystery Sex Theater 8: Once A Year Made at the North Pole #4
2		9. 10.	In YourFace Black Velvet 7
2:	Digital Feature 77	1.	In Your Face
2:	(7/18/01)	2. 3.	Black Velvet 7 Groove With Me
، 2		4. 5.	Heat Rises Party Trash
2		6. 7.	Chloe's Acting Up Staff
2		8. 9.	The Amateurs, Pt. 2 My Baby Got Back #22
2			
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			-77-
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 ${\bf COMPLAINTIN\ EQUITY\ FOR\ A\ DECLARATORY\ JUDGMENT, etc.}$

1 2 3 4 5	Digital Feature 78 (7/19/01)	 The Amateurs, Pt. 2 My Baby Got Back #22 Jumping Track The Amateurs, Pt. 1 Young Pretty Thing 3 East Meets West 3 Young Pretty Thing 3 Looks Like an Angel Farmer's Daughters Do The Web Flash
6 7	Digital Feature 79 (7/20/01)	 Farmer's Daughters Do The Web Flash Casting Couch Cuties #2 The Amateurs, Pt. 2
8		5. Sex Slider
9		6. Fact or Fiction 7. Liquid Sex
10		8. Black Velvet 59. Mystery Sex Theater 8: Once A Year
11	Digital Feature 80	1. Black Velvet 5
12	(7/21/01)	 Mystery Sex Theater 8: Once A Year Love Hurts
13		4. Young Pretty Thing 35. Sorority Sex Kittens #8
14		6. On the Paths of Time
15		 Sorority Sex Kittens #8 The Morgan Sex Project #3
16		9. The Amateurs, Pt. 1 10. Hungry
17	Digital Feature 81	1. The Amateurs, Pt. 1
18	(7/22/01)	2. Hungry3. Liquid Sex
19		4. Identity Crisis5. Ethnicity 7
2c		6. Chloe's Acting Up7. East Meets West 3
21		8.' In Your Face 9. Liquid Sex
	Digital Faatuma 92	
22	Digital Feature 82 (7/23/01)	2. In Your Face
23		 Sin Town Heat Rises
2'		5. Eighteen Holes6. Party Trash
25		7. Chloe's Acting Up8. My Sexy Summer Job
2t		9. No Man's Land: Interracial Edition #5
2:		
21		
		-78-

COMPLAINT IN EQUITY FOR A DECLARATORY JUDGMENT, etc.

1	Digital Feature 83 (7/24/01)	1.	No Man's Land: Interracial Edition #5 Eighteen Holes
2	(//24/01)	2. 3.	Jumping Track
3		4. 5.	Farmer's Daughters Do The Web Liquid Sex
4		6. 7.	10 Little Angels Fact or Fiction
5		8. 9. 10.	Snow Bound Sorority Sex Kittens #5 Ethnicity 7
6			
7	Digital Feature 84 (7/25/01)	1. 2. 3.	Sorority Sex Kittens #5 Ethnicity 7 Looks Like an Angel
8		4.	Farmer's Daughters Do The Web
9		5. 6.	Flash Chic Boxing
10		7. 8.	Young Pretty Thing 3 Sex Slider
		9.	Making Changes
11	Digital Feature 85	1.	Sex Slider
12	(7/26/01)	2. 3.	Making Changes In Your Face
13		4.	Sorority Sex Kittens #5
14		5. 6.	Lust, Lies, and Lingerie Strip Club Tails
		7.	The Blue Room Computerized Sex Cravings
15		8. 9.	Young Pretty Thing 3
16	Digital Feature 86	1.	Computerized Sex Cravings
17	(7/27/01)	2.	Young Pretty Thing 3
18		3. 4.	Identity Crisis Liquid Sex
		5.	Hot Bods And Tail Pipes 11
19		6. 7.	In YourFace Hot Bods And Tail Pipes 11
2c		8.	Hungry
21		9. 10.	Party Trash The Morgan Sex Project #3
22	Digital Feature 87	1.	Party Trash
21	(7/28/01)	2. 3.	The Morgan Sex Project #3 Young Pretty Thing 3
		4.	Sin Town
24		5. 6.	Working It The Blue Room
25		7.	Sorority Sex Kittens #5
2€		8. 9.	Ethnicity 7 Eighteen Holes
2'			
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1	Digital Feature 88	1.	Ethnicity 7
	(7/29/01)	2.	Eighteen Holes
2		3. 4.	Fact or Fiction Hot Bods And Tail Pipes 11
3		4. 5.	Cheerleader Orgy
		6.	Casting Couch Cuties #2
4		7. 8.	Sex Slider Identity Crisis
5		o. 9.	Party Trash
6	Digital Faatura 90	1	Identity Crisis
6	Digital Feature 89 (7/30/01)	1. 2.	Party Trash
7	, ,	3.	Love Hurts
n		4. 5.	Liquid Sex
a		5. 6.	Jumping Track Sins OE A Woman
ç		7.	In Your Face
4.0		8.	Lust, Lies, and Lingerie
1C		9. 10.	Cheerleader Orgy Ethnicity 7
11		10.	Limiting 7
	Digital Feature 90	1.	Cheerleader Orgy
12	(7/31/01)	2. 3.	Ethnicity 7 East Meets West 3
13		4.	Sex Slider
		5.	Angel's Delights
14		6. 7.	Chic Boxing A Winter's Passion
15		8.	Party Trash
		9.	Casting Couch Cuties #2
1€	Digital Feature 91	1.	Party Trash
1;	(8/1/01)	2.	Casting Couch Cuties #2
	· ´	3.	Fact or Fiction
18		4. 5.	Sorority K's 5 Sex Slider
19		6.	Looks Like an Angel
		7.	Girls' Night Out
20		8. 9.	Babe Watch 4 The Madam's New Maid
21		10.	Flash
2:	Digital Feature 92	1.	The Madam's New Maid
2:	(8/2/01)	2. 3.	Flash In Your Face
∠. •		4.	Sweet Desires
2₄		5.	Casting Couch Cuties #2
21		6. 7.	Identity Crisis Lust, Lies, and Lingerie
21		8.	In the Mind d Madness
20		9.	In Your Face
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1 2	Digital Feature 93 (8/3/01) Lust, Lies, and Lingerie In the Mind & Madness Young Pretty Thing 3 Working It
3	5. The Bar 6. Sex Slider 7. Hell, Hookers & Heels
5	7. Hell, Hookers & Heels 8. Wages OE Sin 9. Ace In the Hole
6	Digital Feature 94 1. Wages QE Sin
7	(8/4/01) 2. Ace In the Hole 3. Looks Like an Angel
8	4. Lust, Lies, and Lingerie5. Almost Innocent
9	6. Cheerleader Orgy 7. Hungry 8. Fetish Dreams
10	8. Fetish Dreams 9. Babe Watch 4
11	Digital Feature 95 1. Fetish Dreams (8/5/01) 2. Babe Watch 4
12	(8/5/01) 2. Babe Watch 4 3. Hot Bods 11/II 4. Party Trash
13	5. Nymph Fever 4 6. Liquid Sex
14	7. Working It 8. Young Pretty Thing 3
15	9. Joyride
16	THE FOUR COMPUTERIZED THE AND MOTION STRIPLE OF
17	THE FOUR COMPUTERIZED TIME AND MOTION STUDIES OF: "101 CHEERLEADERS & 1 JOCK"; "HELL ON HEELS"; AND "MORE THANA HANDELL OF (TWO VERSIONS) WHICH HAVE DEPARTED.
18	THANAHANDFUL 9" (TWQ VERSIÓNS), WHICH HAVE BEEN PLEADED BY INCORPORATION AS AUTOPTICAL PROFERENCES IN THIS DETITION FOR WRITING MANDAMUS UNDER PEOPLE FYREI. PUSCH
19 20	PETITION FOR WRIT OF MANDAMUS UNDER <u>PEOPLE EXREL. BUSCH</u> <u>V. PROJECTIONROOM THERATER. ETAL.</u> , 17 CAL, 3D 42, 58, PRESENT THIS COURT WITH AN OPPORTUNITY TO ISSUE A RULENZSZORDER
21	WHICH WILL HAVE THE EFFECT OF HALTING, OVERNIGHT, THE TRADE (MANUFACTURE, DISTRIBUTION, SALE, PUBLICATION AND
22	EXHIBITION) OF <i>MALUM IN SE</i> INDECENT SEXUAL CONDUCT AND OBSCENITY IN MOTION PICTURE FILMS.
23	91. The four computerized Time and Motion Studies, which are before this Court as
24	autoptical proferences, establish, beyond peradventure, that all four films are Hard-core Pornography,
25	as a matter of California Law and Federal Law, and exhibit malum in se indecent sexual conduct
26	in violation of the State of California Public Nuisance Statutes, see <u>People</u> ex <u>rel. Busch</u> v.
27	Projection Room Theater, et al., 17 Cal.3d 42, 58, 130 Cal.Rptr. 328 at 331-335, 550 P.2d 600
28	(Supreme Ct., June 1, 1976) (<u>Busch II</u>). They cannot be exhibited on Cable T.V. for profit. <u>This</u>
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court should note Jurisdiction and issue the proposed "Emergency" *Rule Nisi* which was requested om the U.S. Supreme Court in the fifth pleading which was filed in the High Court. requiring .T.&T. to show cause why it should not be ordered to cease broadcasting the above four motion ictures to its "In Demand" Pay T.V. audiences of "consenting adult" viewers pursuant to the pinion of the U.S. Supreme Court in *Paris Adult Theatre I. et al. v. Slaton*, 413 U.S. 49, 37 .Ed.2d 446, 93 S.Ct. 2628 (June 21, 1973); reh. den. 414 U.S. 881, 38 L.Ed.2d 128, 94 S.Ct. 27, No. 71-1051), argued Oct. 19, 1972; see also *People ex rel. Busch v. Projection Room Theater*, *t al.* (*Busch II*), supra. See the July 26,2002 Pleading at "Index page ii" under "Question 5", the eading "Proposed *Rule Nisi*". The *Rule Nisi* in this case should read substantially as follows:

Proposed Rule Nisi

- "The Petition of Private Attorney General James J. Clancy, et al., for a Rule Nisi Order and Writ of Mandamus to Show Cause is granted. Probable Jurisdiction is noted.
- "Within 40 days after service of this Order, Defendant and Respondent A.T.&T. Corp. shall file a written response in this Court and show cause why the three films: '101 Cheerleaders and I Jock' and 'Hell on Heels' and 'More Than A Handful 9', and 'pandering' previews, which are named in the Petition and Complaint, are entitled to First Amendment protection and should not be barred from broadcasting on A.T.&T.'s 'In Demand, Pay For View, Adults Only' Cable Broadcast on Channels 96 and 457 and 459, as being in violation of Federal Law, and Contraband, and contrary to the Rules of Law expressed in Paris Adult Theatre I, et al. v. Slaton, 413 U.S. 49, 37 L.Ed.2d 446, 93 S.Ct. 2628 (1973); and
- Further, within five (5) days after service of this Order, Defendant and Respondent A.T.&T. Corp., shall inform Petitioners in writing. the names of the titles of any 10 additional motion picture videotapes from the list of 121 titles named in Petitioners' pleadings, which Defendant/Respondent believes are also entitled to First Amendment protection; and within 35 days thereafter, Petitioners/ Plaintiffs shall file with this Court computerized time and motion studies of those 10 titles, similar to those now on file in this Court, as part of Petitioners' original pleadings.
- Provided, however, that if, upon receipt and examination of the computerized Time and Motion Studies of the 10 additional motion picture videotapes, this Court is of the opinion that the films are not hardcore pornography and that the Rules of Law expressed by this Court in <u>Paris Adult Theater I v. Slaton</u>, supra, do not apply, then this Rule <u>Nisi</u> will be discharged as 'improvidently granted'.'
- Provided further, that if the Court is of the opinion that the films are hardcore pornography, and that the Rules of Law expressed in *Paris Adult Theater Zv. Slaton*, supra, do apply, the Court will issue an Order to that effect and within five (5) days after service of such Order, Defendant and Respondent *A.T.&T. Corp.* may inform Petitioners in writing, the names of the Titles of any 10 additional motion picture videotapes from the list of 121 titles named in Petitioner's pleadings at Appendix *G*, which Respondent believes are also entitled to First Amendment protection, and the above process shall be resumed until all 121 films have been examined and ruled upon by the Trial Court,"

A COMPARISON: THE "DIGITAL PHOTO" (COMPUTER) PRODUCED "TIME AND MOTION STUDY" PROCESS USED IN THIS CASE, AND THE ANTIQUATED "NEGATIVE PHOTO" (CAMERA) PRODUCED PROCESS USED IN THE PAST:

- 92. For the past 30 years, this Private Attorney Generalhas utilized the **Time** and **Motion** Study (photographic still) process in obscenity litigation, involving motion picture films. This 'process', as originally conceived, was intended to, and did solve the problems incident to the attacks of the pornographer's attorneys on the search warrant process, the subpoena duces tecum process, and this Court's requirement of an "adversary hearing". Then, the analyses were produced entirely by a photographic process which required approximately five days production time to complete one **Time and Motion** Study of a motion picture, with a playing time in the order of 57 minutes ²²¹.
- 93. Notwithstanding the deficiencies of the "photographic" process, each time the Time and Motion Study process was applied. its objective was eventually accomplished. It was used in every case in the ten years of litigation with the *Mitchell Brothers' Santa Ana Theatre*, in Orange County, California, with 100% success. Except for the fact that the Justices on this Court have thus Far refused to note jurisdiction and rule on the "Closure" Issue, which was presented to this Court in the context of that "crisis", the victories which were achieved against the *Mitchell Brothers'* in the Santa Ana Courtrooms would have settled the hard-core pornography issue, and the problem of rampant exhibition of hard-core pornography on T.V. would not exist today. That is a "Jurisdictional" fact!
- 94. This "Private Attorney General" submits that the responsibility for this present crisis quite clearly rests on the members of the U.S. Supreme Court, circa 2002, and for that reason, this Trial Court must assert its <u>Original Jurisdiction now</u> and issue the **Rule** *Nisi* with the <u>specific</u> objective of complying with the Order of the U.S. Supreme Court, dated April 15, 2002, which is

The photographs were black and white, of low grade quality, and were produced through the use of a 16mm still camera in the theater, with the timing internally recorded by a tape recorder or, with the videotape timing copy for each frame being accomplished by the use of an intervalometer, which inserted a timing video signal between the duplication of a Pornography Store-bought videotape of the involved feature being played into a video recorder creating the "Master" tape.

95. The Time and Motion Study which was filed with the U.S. Supreme Court by the indersigned ^{23/}, as an *Amicus Curiae* in *Paris Adult Theatre I, et al. v. Slaton*, October Term, 1971, No. 71-1051, supra, on the Petition for Writ of Certiorari to the Supreme Court of Georgia, utilized 1079 "timed" black and white photographs at approximately 3-6 second intervals for the film "*Magic Mirror*" (playtime: 67min.), and 670 "timed" black and white photographs for the film "*It* All Comes *Out In The End*" (playtime: 49min.). The **Time and Motion Study** did, in fact, achieve the result which was intended. Even though the circumstances under which they were produced were <u>crude</u> ^{24/}.

- 96. The Atlanta, Georgia Solicitor General was unable to continue that process without this Petitioner's assistance after the 6 month contract had expired, which required Petitioner to Visit the Supreme Court and accomplish that task by filing it as an Amicus *Curiae*. See the Briefs and Appearances of Counsel and Amicus *Curiae* in *Paris* Adult *Theater Iv*. *Slaton*, supra, 37 L.Ed.2d at 1107-1110, and pages 11-63 of the Amicus *Curiae* Brief.
- 97. The use of a 16mm still camera (negative) is now accomplished by a "video capture" of the entire feature by a computer. By stopping the VHS Video "timed" copy of the VHS tape at a particular frame on the "still" version, that "still frame" can be analyzed in relation to the **Time and Motion** (still) Study photos before and after the video "timed" "freeze frame". Each frame on the **Time and Motion** (still) Study is now subject to cross-examination as to content, etc., as are the (still) frames of "HellOn Heels", which depict what appears to be a long dagger being used as a dildo, and inserted in the vagina of a female participant to stimulate the "prurient interest" of the T.V. audience!
- 98. The "computerized **Time and Motion Study** process is now decisive. The **Time** and Motion (video "timed") Study contains a "timed" copy of every frame that has been included in the film by the Producer of the film. It precludes "befuddling" by deceptive legal defense tactics

See "Exhibit I", lodged with this Court with the second (Supplemental) Motion, dated March 1,2002

Shot (1) in ordinary daylight, in a conference room; (2) using high speed surveillance film; (3) or a portable screen, rented for that purpose; and (4) using the single shot features of a 16mm motion picture camera.

- (A) Petitioners are entitled to an accounting and forfeiture of the unlawful profits derived from *A.T.&T.*'s broadcast of the four hardcore films and *malum in se* sexual conduct and moral public nuisances and unlawful business practice, along with the films which have been brought before and considered by the Trial Court, which funds are to be forfeited by *A.T.&T*. and to be held in trust for the benefit of the citizens within the Judicial District.
- (B) Petitioners are entitled to costs and an attorney's fee as the prevailing party on the summary abatement lawsuit.

CONCLUSION

THIS PRIVATE ATTORNEY GENERAL RESPECTFULLY CONTENDS THAT THE U.S. SUPREME COURT IS FACING A MORAL CRISIS OF CATASTROPHIC PROPORTIONS— AKIN TO THAT FACED BY THE CATHOLIC CONFERENCE OF BISHOPS IN 1985. THE QUESTION IS, "WILL THAT COURT, WITH KNOWLEDGE OF THE "DESUETUDE" ALLEGED HEREIN, PERMIT THE PLAYBOY PHILOSOPHY TO ALTER THE COMMONLAW MORAL STANDARDS OF COMMONDECENCY OF THIS NATION BY CONTINUING TO BROADCAST ITS HOT NETWORK AND HOTZONE PORNOGRAPHICFILMS TO A. T. & T. 'SPAY-PER-VIEW T.V. AUDIENCE?"

100. The U.S. Conference of Catholic Bishops, which met in Collegeville, Minnesota, in 1985, were faced with the 92 page **Dovle Report** (*Doyle, Peterson, and Mouton*), whichurged the Catholic Hierarchy to take action to combat a growing sexual abuse scandal. That Conference rirtually ignored the report and invited the scandal which erupted in January of 2002. See, in this regard, the *LA*. **Times** article, dated June 1, 2002, a copy of which is included in the "Amended Complaint" at **Appendix H.** It is believed by many that if the Catholic Hierarchy had attended to the matter in 1985, the disaster in the year 2002 would not have taken place.

101. A Society in which its highest Judicial Branch <u>refuses</u> to consider and <u>apply</u> the <u>Fundamental Norms of its moral code</u>, when such matters are <u>properly before the Judiciary in a "civil</u> context", in an Open Courtroom, will not endure. That stagemust not be reached in this Courtroom.

1	102. The relief as herein above requested should be granted as prayed for
2	Dated: October 2, 2002
3	Respectfully submitted,
4	
5	James J. Clancy
6	Attorney for Plaintiff, In Pro Se
7	Acting as a Private Attorney General 9055 La Tuna Canyon Road Sun Valley, California 91352-2221 (818) 352-2069
8	(818) 352-2069
9	
10	<u>VERIFICATION</u>
11	I certify under penalty of perjury, under the laws of the State of California, that the foregoing
12	true and correct
13	Dated: October 2, 2002 Respectfully submitted,
14	In I Change
15	James J. Clancy 9055 La Tuna Canyon Road Sun Valley, California 91352
16	Attorney In Pro Se
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